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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

RAMAPOUGH MOUNTAIN INDIANS, INC., and
RAMAPOUGH LENAPE NATION

Plaintiffs,

-against-

THE TOWNSHIP OF MAHWAH, RAMAPO
HUNT & POLO CLUB ASSOCIATION, INC.,
GERALDINE ENTRUP, in her official capacity,
THOMAS MULVEY, in his official capacity,

Defendants.

Civ. No. 2:18-cv-09228

**DECLARATION OF KEVIN J.
ARQUIT IN SUPPORT OF
PLAINTIFFS' MOTION FOR
LEAVE TO FILE FIRST
AMENDED COMPLAINT**

I, Kevin J. Arquit, declare under penalty of perjury as follows:

1. I am a member of the Bar of the State of New York (admitted *pro hac vice* in the above-captioned case) and a partner at the law firm of Weil, Gotshal & Manges LLP, attorneys for Plaintiffs Ramapough Mountain Indians, Inc. and Ramapough Lenape Nation (“Plaintiffs”) in this action.

2. I have personal firsthand knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

3. I submit this Declaration in Support of Plaintiffs’ Motion for Leave to File First Amended Complaint. The relevant facts regarding the merits of the Motion are set forth in the accompanying Memorandum of Law in Support of Plaintiffs’ Motion for Leave to File First Amended Complaint, and the exhibit attached thereto.

4. A true and correct copy of the Plaintiffs’ First Proposed Amended Complaint is attached hereto as Exhibit 1.

5. A true and correct copy of the Redline to the Original Complaint is attached hereto as Exhibit 2.

I declare under penalty of perjury that the foregoing facts are true and correct. This declaration was executed on the 21st day of September 2018.

Dated: New York, New York
September 21, 2018


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